IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: EDWIN CARRASQUILLO DIAZ LORENZA ELFRIDA CORA SANTIAGO DEBTORS	CASE NO 11-10699 MCF CHAPTER 13

DEBTORS' REPLY TO *TRUSTEE'S UNFAVORABLE REPORT ON POST CONFIRMATION MODIFIED PLAN DATED 6/30/2016,* DOCKET NO. 90 AND IN COMPLIANCE WITH *ORDER* DOCKET NO. 91

TO THE HONORABLE COURT:

COME NOW, EDWIN CARRASQUILLO DIAZ, R.I.P., and LORENZA ELFRIDA CORA SANTIAGO, debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. The Chapter 13 Trustee filed a Trustee's unfavorable report on proposed post confirmation Plan, docket entry no. 90.

2. On July 13, 2016, this Honorable Court Ordered the debtors to reply to the Chapter 13 Trustee's unfavorable recommendation within fourteen (14) days. *Order*, dated July 13, 2016, docket no. 91.

3. The debtors hereby reply to Trustee's report on confirmation as follows.

4. That the debtors have cured the Plan arrears in the sum of $420.00 as stated by the Trustee in the aforestated "unfavorable report". Attached is copy of Trustee's *Financial Summary*, which reflects that on July 21, 2016, the debtors paid the sum of $600.00 which payment cures the arrears in the debtors' Plan.

5. That the debtors' proposed modified Plan provides for a "lump sum" payment of $16,524.00 in order to pay in full (100%) all general unsecured claims in the above captioned case. That there are certain claims that debtors will object since the debtors understand that the same are covered with a "personal loan life insurance policy", thus, these [the claims to be objected] are to be paid directly and from the proceeds of said life insurance policy.

6. That the source of the proposed "lump sum" payment ($16,524) comes from the proceeds of a liquidation of a "retirement fund" received by Joint debtor Lorenza Elfrida Cora Santiago, stemming from the death of Debtor Edwin Carrasquillo Diaz. See Debtors' *Motion Requesting Re-Conversion to Chapter 13*, at paragraph 3, docket entry #81.

7. With this information debtors respond to the Trustee's unfavorable report on confirmation dated July 12, 2016, docket no. 90.

WHEREFORE debtors respectfully pray that Trustee's unfavorable report on recommendation, docket no. 90, be denied.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to Alejandro Oliveras Rivera, Esq., Chapter 13 Trustee; and I also certify that I have mailed by United States Postal Service copy of this motion to the following non-participant: debtors, Lorenza Elfrida Cora Santiago, HC 65 Box 4365 Patillas PR 00723, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 28th day of July, 2016.

/s/ *Roberto Figueroa Carrasquillo*
USDC #203614
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FINANCIAL SUMMARY - CASE 11-10699

EDWIN CARRASQUILLO DIAZ paying **$163.00** ANNUALLY

Receipts | Rcpts/Deb Refunds | Disbursements | Adjustments | Trustee Disb | Trustee Adj | Show All

Limits: Select Start Date | Select Claim ID | Select Payee Name   Check Status: Cleared | Stale Dated | Stop Payment | Cancelled | Voided | Outstanding

Date	Payee	Payee Name	Source / Check	Description	Receipts	Disbursements	Balance
7/21/2016			0714 86302 0003	LOCKBOX PAYMENT	$600.00		
6/6/2016			0714 86500 0003	LOCKBOX PAYMENT	$200.00		
6/6/2016			0714 86500 0003	LOCKBOX PAYMENT	$200.00		
3/2/2016			Deb 03-02 2016	OFFICE DIRECT DEPOSIT	$200.00		
2/5/2016			0714 86700 0003	LOCKBOX PAYMENT	$163.00		
2/3/2016			0714 86700 0003	LOCKBOX PAYMENT	$400.00		
1/26/2016			0714 86702 0003	LOCKBOX PAYMENT	$200.00		
1/5/2016			0714 86303 0003	LOCKBOX PAYMENT	$200.00		
11/23/2015			0714 86303 0003	LOCKBOX PAYMENT	$200.00		
10/28/2015			0714 86700 0003	LOCKBOX PAYMENT	$200.00		
9/18/2015			0714 86302 0003	LOCKBOX PAYMENT	$200.00		
7/21/2015			0714 86309 0003	LOCKBOX PAYMENT	$200.00		
6/12/2015			0714 86302 0003	LOCKBOX PAYMENT	$200.00		
5/7/2015			0714 86306 0003	LOCKBOX PAYMENT	$200.00		
4/22/2015			0714 86306 0003	LOCKBOX PAYMENT	$200.00		
2/24/2015			0714 86302 0003	LOCKBOX PAYMENT	$200.00		
2/2/2015			0714 86307 0003	LOCKBOX PAYMENT	$200.00		
12/29/2014			0714 86700 0003	LOCKBOX PAYMENT	$200.00		
11/25/2014			0714 86306 0003	LOCKBOX PAYMENT	$200.00		
10/29/2014			0714 86700 0003	LOCKBOX PAYMENT	$200.00		
10/3/2014			0504 00030 3067	LOCKBOX PAYMENT	$200.00		
8/28/2014			0502 00500 0928	LOCKBOX PAYMENT	$200.00		
7/29/2014			0501 01120 0476	LOCKBOX PAYMENT	$200.00		
6/24/2014			0501 00040 3130	LOCKBOX PAYMENT	$200.00		
6/3/2014			0501 00900 2806	LOCKBOX PAYMENT	$200.00		
4/28/2014			0651 00321 4390	LOCKBOX PAYMENT	$200.00		
3/21/2014			0655 00381 8381	LOCKBOX PAYMENT	$200.00		
2/21/2014			0653 00141 7512	LOCKBOX PAYMENT	$200.00		
1/22/2014			217 1 -22 2014	OFFICE DIRECT DEPOSIT	$200.00		
12/24/2013			0656 00161 2056	LOCKBOX PAYMENT	$200.00		
11/20/2013			0501 01380 5978	LOCKBOX PAYMENT	$200.00		
10/21/2013			0500 01370 5807	LOCKBOX PAYMENT	$200.00		
9/18/2013			0500 00800 8493	LOCKBOX PAYMENT	$200.00		
8/20/2013			0501 00520 8874	LOCKBOX PAYMENT	$200.00		
7/19/2013			210 7 -19 2013	OFFICE DIRECT DEPOSIT	$200.00		
6/19/2013			0501 01390 8404	LOCKBOX PAYMENT	$200.00		
5/23/2013			0501 00770 6215	LOCKBOX PAYMENT	$200.00		
4/22/2013			0500 00890 3654	LOCKBOX PAYMENT	$200.00		
3/15/2013			0501 00540 4718	LOCKBOX PAYMENT	$200.00		
2/20/2013			0658 00201 1195	LOCKBOX PAYMENT	$200.00		
1/16/2013			0652 00281 7456	LOCKBOX PAYMENT	$200.00		
12/21/2012			0652 00041 7603	LOCKBOX PAYMENT	$200.00		
11/20/2012			0652 00461 6823	LOCKBOX PAYMENT	$200.00		
10/17/2012			0502 01550 6456	LOCKBOX PAYMENT	$200.00		
10/12/2012			1354 70000 0003	INTERNET PAYMENT RETURNED	($200.00)		
10/9/2012			1354 70000 0003	INTERNET PAYMENT	$200.00		
9/12/2012			0502 00020 5111	LOCKBOX PAYMENT	$200.00		
8/9/2012			0502 01270 3222	LOCKBOX PAYMENT	$200.00		
7/17/2012			0503 01350 0300	LOCKBOX PAYMENT	$200.00		
6/13/2012			0502 00870 7134	LOCKBOX PAYMENT	$200.00		
5/15/2012			0500 03280 6011	LOCKBOX PAYMENT	$200.00		

4/13/2012			0501 00690 9605	LOCKBOX PAYMENT	$200.00		
3/8/2012			0501 00040 0030	LOCKBOX PAYMENT	$200.00		
2/10/2012			0502 00530 3393	LOCKBOX PAYMENT	$200.00		
1/18/2012			0653 00241 8930	LOCKBOX PAYMENT	$200.00		
				Totals:	**$11,163.00**	**$0.00**	